

Annex C7: daa EIAR Supplement (September 2023), Flight Path Admission

Source

EIAR Supplement prepared by AECOM for daa, submitted to An Bord Pleanála in response to ABP's 27 April 2023 Request for Further Information. Original document in the ABP Relevant Action file (ABP-314485-22).

The Admission

daa's own EIAR Supplement states the reason for the supplementary assessment:

"Actual flightpaths from North Runway upon commencement differing from assumed flightpaths used for modelling/assessment purposes in the EIAR"

This is a formal written admission by daa that:

1. The flight paths used in the environmental assessment (both the 2004 EIS and the 2021 EIAR) were not the flight paths actually implemented
2. The modelling upon which planning permission was granted, and upon which the Relevant Action application was based, did not reflect the operational reality
3. The environmental impact assessment that formed the basis for public participation was conducted on the wrong flight paths

Further Admissions in EIAR Chapter 13

The EIAR Chapter 13 (Aircraft Noise and Vibration, by Bickerdike Allen Partners) replaced the assumed straight-ahead departures with radar-tracked actual paths showing turns:

"Reflecting the actual flight paths from North Runway by using radar data to determine the future modelled tracks"

The chapter does not directly compare with the 2004 EIS or acknowledge the planning permission breach. It simply substitutes the actual flight paths into the model as though they were always the intended paths.

Ground Noise Error

The 2021 EIAR assessment "did not have the required 'A weighting' applied" to ground noise calculations. This error was only corrected in the September 2023 supplement, meaning the original environmental assessment presented to the public contained a fundamental technical error in its noise modelling.

Aarhus Relevance

Under Articles 6 and 7 of the Aarhus Convention, the public must be given the opportunity to participate in decisions on activities that may have a significant effect on the environment. The environmental assessment upon which that participation was based modelled flight paths that were never implemented. The actual flight paths were implemented without any public participation process. daa's own supplementary assessment confirms this discrepancy.

Source File for Full Document

Original PDF: Planning Permission/Relevant Action ABP/EIAR/ (AECOM, September 2023)